

Subject: Re: Interactive Giving Fund docs
Date: Friday, June 25, 2021 at 5:43:10 PM Central Daylight Time
From: Brian Boyd
To: Stewart Ryan
CC: Bennett Wills, Law Office of Boyd & Wills
Attachments: image001.png, image002.png, image003.png, image004.png, image005.png

Stewart,

The documents show that these funds have been turned over to a brokerage firm that handles these funds. Thus, these funds are under the control of that brokerage, which is Vanguard.

With my regards, I remain,

Sincerely,

Brian T. Boyd



Brian T. Boyd | Attorney
Law Office of Boyd & Wills
214 Overlook Circle, Suite 275
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(615) 861-1936 | (615) 523-2595 Facsimile
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From: Stewart Ryan <sryan@laffeybuccikent.com>
Date: Friday, June 25, 2021 at 5:33 PM
To: Brian Boyd <brian@boydwills.com>
Cc: Bennett Wills <bennett@boydwills.com>, Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Brian, respectfully I don't think the documents speak for themselves based on our due diligence prior to filing suit and the research I've done since our conversation of last week. That is why I sent my email earlier this

afternoon. It may be that another conversation between us can resolve this issue and I would encourage you to consider that. If you are willing to confer on this further I can make myself available this weekend or before 10 AM ET on Monday. If you are unwilling to discuss this further then file your motion but I have appreciated your courtesy thus far and am just trying to completely understand your client's position on this before moving forward in the fashion you have suggested. Let me know.

Stew

--

M. Stewart Ryan, Esquire
Laffey, Bucci & Kent, LLP
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1100 Ludlow Street, Suite 300
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Visit us at www.laffeybuccikent.com

From: Brian Boyd <brian@boydwills.com>
Sent: Friday, June 25, 2021 5:31 PM
To: Stewart Ryan
Cc: Bennett Wills; Law Office of Boyd & Wills
Subject: Re: Interactive Giving Fund docs

Stewart,

These documents speak for themselves. I don't think I need to make any further representations at this point. You sued a non-entity that is not capable of being sued, and I have stated before, it is akin to suing a bank account. I look forward to either a dismissal with prejudice from the Plaintiffs or arguing my motion to dismiss before Judge Trauger.

With my regards, I remain,

Sincerely,

Brian T. Boyd



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From: Stewart Ryan <sryan@laffeybuccikent.com>
Date: Friday, June 25, 2021 at 4:24 PM
To: Brian Boyd <brian@boydwills.com>
Cc: Bennett Wills <bennett@boydwills.com>, Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Are you willing to represent that there is not a 501(c)(3) entity (whether that is Be Interactive or any other entity) sponsoring the donor advised fund that is IGF so as to clarify the language of the declaration?

--

M. Stewart Ryan, Esquire
Laffey, Bucci & Kent, LLP
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From: Brian Boyd <brian@boydwills.com>
Sent: Friday, June 25, 2021 5:15 PM
To: Stewart Ryan
Cc: Bennett Wills; Law Office of Boyd & Wills
Subject: Re: Interactive Giving Fund docs

Stewart,

We are willing to allow you until Monday at noon to make your decision to dismiss the Interactive

Giving Fund based on continued due diligence you and your team need to conduct but we will file our motion to dismiss at 12 EST Monday if you have not dismissed our client by that point.

With my regards, I remain,

Sincerely,

Brian T. Boyd



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From: Stewart Ryan <sryan@laffeybuccikent.com>
Date: Friday, June 25, 2021 at 3:58 PM
To: Brian Boyd <brian@boydwills.com>
Cc: Bennett Wills <bennett@boydwills.com>, Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Thank you Brian. I am in a deposition that will (hopefully) wrap up soon. In the meantime I wanted to get back to you with a question re: what you sent.

Paragraph 5 of the declaration states in part that "all charitable funds held by Be Interactive were transferred to a section 501(c)(3) donor advised fund maintained by Vanguard..."

From what I understand there are 501(c)(3)'s and there are donor advised funds. A donor advised fund is not itself a 501(c)(3) but is (as you indicated during our call) an account that funds charitable endeavors at the advice or direction of a non profit or individual. However such accounts can be sponsored by a 501(c)(3). Please clarify that there is not a 501(c)(3) entity (whether that is Be Interactive or any other entity) sponsoring the donor advised fund that is IGF. I was a bit confused by the language used in the declaration since it suggests the account may be sponsored by and/or connected to a 501(c)(3) whereas during our call you indicated that the fund was created from Be Interactive funds and administered at the advice of Mr. Ashton. Hopefully my question to you makes sense. Much appreciated.

Stew

--

M. Stewart Ryan, Esquire

Laffey, Bucci & Kent, LLP

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From: Brian Boyd <brian@boydwills.com>

Sent: Friday, June 25, 2021 9:54:15 AM

To: Stewart Ryan <sryan@laffeybuccikent.com>

Cc: Bennett Wills <bennett@boydwills.com>; Law Office of Boyd & Wills <office@boydwills.com>

Subject: Re: Interactive Giving Fund docs

Stewart,

See the attached.

With my regards, I remain,

Sincerely,

Brian T. Boyd



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From: Stewart Ryan <sryan@laffeybuccikent.com>
Date: Friday, June 25, 2021 at 7:13 AM
To: Brian Boyd <brian@boydwills.com>
Cc: Bennett Wills <bennett@boydwills.com>, Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Brian, you forwarded three attachments which I presume are intended to be attached to a declaration from Mr. Sridharan but you did not forward the declaration itself. Would you kindly forward the declaration? Thank you.

Stew

From: Brian Boyd <brian@boydwills.com>
Sent: Thursday, June 24, 2021 12:05 PM
To: Stewart Ryan <sryan@laffeybuccikent.com>
Cc: Bennett Wills <bennett@boydwills.com>; Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Stewart,

Close of business tomorrow, Friday June 25, 2021, is agreeable. I look forward to hearing from you.

With my regards, I remain,

Sincerely,

Brian T. Boyd



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From: Stewart Ryan <sryan@laffeybuccikent.com>
Date: Thursday, June 24, 2021 at 10:51 AM
To: Brian Boyd <brian@boydwills.com>
Cc: Bennett Wills <bennett@boydwills.com>, Law Office of Boyd & Wills <office@boydwills.com>
Subject: Re: Interactive Giving Fund docs

Brian, thank you for sending this. As I mentioned on the phone during our call I was recently away on vacation and just got back yesterday. If you would kindly give me until COB tomorrow to fully review, discuss with the folks on my end, and reply to your message I would appreciate it, thank you. Let me know at your convenience.

Stew

--

M. Stewart Ryan, Esquire

Laffey, Bucci & Kent, LLP

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From: Brian Boyd <brian@boydwills.com>

Sent: Tuesday, June 22, 2021 10:16:40 AM

To: Stewart Ryan <sryan@laffeybuccikent.com>

Cc: Bennett Wills <bennett@boydwills.com>; Law Office of Boyd & Wills <office@boydwills.com>

Subject: Interactive Giving Fund docs

Stewart,

Following up from yesterday, I am attaching the documents that show Be Interactive, the California Charity, has been dissolved. Along with that I am providing the contribution confirmation from Vanguard showing that the Interactive Giving Fund is an account with a brokerage, not an entity. Please let me know by noon on Thursday if you are willing to dismiss the Interactive Giving Fund. Thank you for the conversation yesterday regarding this matter.

With my regards, I remain,

Sincerely,

Brian T. Boyd



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